

**PUBLIC MATTER  
FILED**

**DEC 28 2018**

**STATE BAR COURT CLERK'S OFFICE  
SAN FRANCISCO**

STATE BAR OF CALIFORNIA  
OFFICE OF CHIEF TRIAL COUNSEL  
MELANIE J. LAWRENCE, No. 230102  
INTERIM CHIEF TRIAL COUNSEL  
SUSAN CHAN, No. 233229  
ASSISTANT CHIEF TRIAL COUNSEL  
ROBERT A. HENDERSON, No. 173205  
SUPERVISING ATTORNEY  
180 Howard Street  
San Francisco, California 94105-1639  
Telephone: (415) 538-2385

**STATE BAR COURT**

**HEARING DEPARTMENT - SAN FRANCISCO**

In the Matter of:	)	Case No. 18-O-13734
	)	
WILLIAM DEAN FERREIRA,	)	NOTICE OF DISCIPLINARY CHARGES
No. 262495,	)	
	)	
A Member of the State Bar	)	

**NOTICE - FAILURE TO RESPOND!**

**IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE  
WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT  
THE STATE BAR COURT TRIAL:**

- (1) YOUR DEFAULT WILL BE ENTERED;**
- (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU  
WILL NOT BE PERMITTED TO PRACTICE LAW;**
- (3) YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN  
THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION  
AND THE DEFAULT IS SET ASIDE, AND;**
- (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.  
SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE  
OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN  
ORDER RECOMMENDING YOUR DISBARMENT WITHOUT  
FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ.,  
RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.**

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. William Dean Ferreira ("respondent") was admitted to the practice of law in the State  
4 of California on March 4, 2009, was a member at all times pertinent to these charges, and is  
5 currently a member of the State Bar of California.

6  
7 COUNT One

8 Case No. 18-O-13734  
9 Former Rules of Professional Conduct, Rule 3-310(C)(1)  
10 [Potential Conflict – Representing Multiple Clients]

11 2. On or about March 20, 2017, respondent accepted representation of multiple clients,  
12 Richard Kasaine ("Kasaine") and Sokhom Chhang ("Chhang"), in joint representation in *People*  
13 *v. Chhang and Kasaine* Sonoma County Superior Court, case no. SCR 705372. At the time  
14 respondent accepted their representation, the interests of the clients potentially conflicted in that,  
15 for example, one client could testify against the other client at trial. Respondent failed to inform  
16 the clients of the relevant circumstances and of the actual and reasonably foreseeable adverse  
17 consequences to the clients and failed to obtain the written consent of each client, in willful  
18 violation of Former Rules of Professional Conduct, rule 3-310(C)(1).

19 COUNT TWO

20 Case No. 18-O-13734  
21 Former Rules of Professional Conduct, Rule 3-310(C)(2)  
22 [Actual Conflict – Representing Multiple Clients]

23 3. On or about March 28, 2017, respondent continued representation of multiple clients,  
24 Richard Kasaine ("Kasaine") and Sokhom Chhang ("Chhang"), in joint representation in *People*  
25 *v. Chhang and Kasaine* Sonoma County Superior Court, case no. SCR 705372. At that time, the  
26 interests of the clients actually conflicted in that, for example, respondent had drafted for  
27 Chhang, and Chhang had signed, an inculpatory Affidavit, which exposed Chhang to additional  
28

1 criminal charges. At that time, respondent continued representation of more than one client in  
2 the matter and did not inform the clients of the relevant circumstances and of the actual and  
3 reasonably foreseeable adverse consequences to the clients and obtain the written consent of  
4 each client, in willful violation of Former Rules of Professional Conduct, rule 3-310(C)(2).

5  
6 **NOTICE - INACTIVE ENROLLMENT!**

7 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR**  
8 **COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE**  
9 **SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL**  
10 **THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO**  
11 **THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN**  
12 **INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE**  
13 **ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE**  
14 **RECOMMENDED BY THE COURT.**

15  
16 **NOTICE - COST ASSESSMENT!**

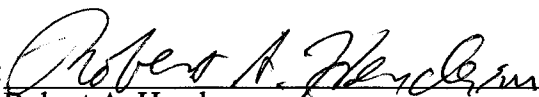
17 **IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC**  
18 **DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS**  
19 **INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING**  
20 **AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND**  
21 **PROFESSIONS CODE SECTION 6086.10.**

22 Respectfully submitted,

23 THE STATE BAR OF CALIFORNIA  
24 OFFICE OF CHIEF TRIAL COUNSEL

25 DATED: December 28, 2018

26 By:

27   
28 Robert A. Henderson  
Supervising Attorney

**DECLARATION OF SERVICE BY CERTIFIED MAIL and REGULAR MAIL**

**CASE NUMBER: 18-O-13734**

I, the undersigned, over the age of eighteen (18) years, whose business address and place of employment is the State Bar of California, 180 Howard Street, San Francisco, California 94105, declare that I am not a party to the within action; that I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service; that in the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day; that I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit; and that in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of San Francisco, on the date shown below, a true copy of the within

**NOTICE OF DISCIPLINARY CHARGES**

in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article Nos.: See Below, at San Francisco, on the date shown below, addressed to:

**William D. Ferreira  
Automotive Defense Specialists  
555 California St Ste 4925  
San Francisco, CA 94104-1717**

**Bret Batchman  
Hansen, Kohls, Sommer & Jacob LLP  
1520 Eureka Rd Ste 100  
Roseville, CA 95661**

**Certified Article No:  
9414 7266 9904 2112 6624 92**

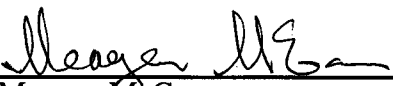
**Certified Article No:  
9414 7266 9904 2112 6624 85**

in an inter-office mail facility regularly maintained by the State Bar of California addressed to:

**N/A**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Francisco, California, on the date shown below.

**DATED: December 28, 2018**

Signed:   
**Meagan McGowan  
Declarant**